

WEIL, GOTSHAL & MANGES LLP
Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER & BENVENUTTI LLP
Tobias S. Keller (#151445)
(tkeller@kellerbenvenutti.com)
Jane Kim (#298192)
(jkim@kellerbenvenutti.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (415) 636-9251

*Proposed Attorneys for Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- Affects PG&E Corporation
 - Affects Pacific Gas and Electric Company
 - Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION BETWEEN DEBTORS
AND OFFICIAL COMMITTEE OF
UNSECURED CREDITORS EXTENDING
TIME TO RESPOND TO MOTIONS TO
BE HEARD ON FEBRUARY 27, 2019**

[No Hearing Requested]

This stipulation and agreement for order (“Stipulation and Agreement for Order”) is entered into by PG&E Corporation (“PG&E Corp.”) and Pacific Gas and Electric Company (the “Utility”), as debtors and debtors in possession (collectively, the “Debtors”), on the one hand, and the Official Committee of Unsecured Creditors (the “Creditors Committee”). The Debtors and Creditors Committee are referred to in this Stipulation and Agreement for Order collectively as the “Parties,” and each as a “Party.” The Parties hereby stipulate and agree as follows:

RECITALS

A. On February 6, 2019, the Debtors filed a notice of hearing [Dkt. 353] noticing sixteen (16) motions listed therein (the “Motions”) for a hearing before the Court at 9:30 a.m. on February 27, 2019.

B. Under Local Bankruptcy Rule 9014-1(c)(2), any opposition or response to the Motions must be filed and served on counsel for the Debtors no later than February 20, 2019.

C. The Office of the United States Trustee filed an Appointment of the Official Committee of Unsecured Creditors on February 12, 2019 [Dkt. 409].

D. On February 14, 2019, proposed counsel to the Creditors Committee requested, and proposed counsel for the Debtors agreed, that the time for the Creditors Committee to respond to the Motions be extended by two days.

NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER, THAT:

1. The time for the Creditors Committee to file and serve any response or opposition to the Motions is extended through February 22, 2019.

[Signatures on Next Page]

**STIPULATION TO EXTEND TIME FOR OCUC
TO RESPOND TO MOTIONS**

1 Dated: February 15, 2019
2 KELLER & BENVENUTTI LLP
3

4 /s/ Tobias S. Keller
5 Tobias S. Keller

6 *Proposed Attorneys for Debtors
and Debtors in Possession*

7 Dated: February 15, 2019
8 MILBANK, TWEED, HADLEY &
9 McCLOY LLP

10 /s/ Thomas R. Kreller
11 Thomas R. Kreller

12 *Proposed Attorneys for Official Committee
of Unsecured Creditors*

13 STIPULATION TO EXTEND TIME FOR OCUC
14 TO RESPOND TO MOTIONS